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 James Dzurenda, Michael Minev,  
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 and Kenneth Williams*

**UNITED STATES DISTRICT COURT  
 DISTRICT OF NEVADA**

GREGORY BOLIN,  
  
 Plaintiff,  
  
 v.  
 DR. KOHN, *et al.*,  
  
 Defendants.

Case No. 3:23-cv-00168-MMD-CLB  
**ORDER GRANTING JOINT  
 STIPULATION FOR  
 EXTENSION OF TIME TO FILE  
 RESPONSE TO MOTION FOR  
 PRELIMINARY INJUNCTION  
 [ECF No. 58]  
 (Third Request)**

Plaintiff, Gregory Bolin, by and through counsel, Julie D. Cantor, J. Cantor Law, and Paula M. Armeni, Clark Hill, PLC and Defendants James Dzurenda, Michael Minev, Ted Hanf, Harold Wickham, Charles Daniels, and Kenneth Williams, by and through counsel, Aaron D. Ford, Nevada Attorney General, and Douglas R. Rands, Senior Deputy Attorney General, of the State of Nevada, Office of the Attorney General, hereby submit this *Joint Stipulation for Extension of Time to file Response to Preliminary Injunction*.

**MEMORANDUM OF POINTS AND AUTHORITIES**

**I. BACKGROUND AND RELEVANT PROCEDURAL HISTORY**

Mr. Bolin filed this case alleging violations of his constitutional rights. (ECF Nos. 5 & 60) Defendants have accepted service. (ECF Nos. 13 & 65) On or about March 25, 2024, this Court issued a Scheduling Order and Discovery Plan. (ECF No. 29). Mr. Bolin filed a Motion for Preliminary Injunction on June 2, 2025 against Dr. Williams in his official

capacity as Medical Director of the Nevada Department of Corrections (“NDOC”). (ECF No. 58) This Court granted stipulated extension of time for Dr. Williams to file the response. (ECF Nos. 64 & 68) Dr. Williams’ response is now due on August 11, 2025. The Parties have been diligently working together on a Stipulation and Consent Order regarding the relief requested in the pending preliminary injunction motion (ECF No. 58), and the NDOC has already alerted the Court that it can likely agree to the substance of the requests set forth by Bolin in the Motion for Preliminary Injunction. (ECF No. 68 at 2:4.) However, it has become clear that modest amount of additional time will be necessary to work out final details. The Parties still believe it is possible that an agreement can be reached via Stipulation and Consent Order that will satisfy both sides and obviate the need for the Court to decide the motion. Therefore, the Parties request additional time for the response.

## **II. APPLICABLE LAW FOR MOTION TO STAY DISCOVERY**

Federal Rule of Civil Procedure 6(b)(1) governs extensions of time and provides as follows:

When an act may or must be done within a specified time, the court may, for good cause, extend the time: (A) with or without motion or notice if the court acts, or if a request is made, before the original time or its extension expires; or (B) on motion made after the time has expired if the party failed to act because of excusable neglect.

Defendant’s request is timely and will not hinder or prejudice Mr. Bolin’s case but will allow for a thorough opportunity to respond to the motion. The requested extension of time should permit the Defendant time to adequately gather the required exhibits and prepare the response. Defendant asserts that the requisite good cause is present to warrant the requested extension of time.

## **III. CONCLUSION**

Defendant Williams asserts that the requisite good cause and extenuating circumstances are present to warrant the requested extension of time. Therefore, he requests an extension of time to file his response to Plaintiff’s Motion for Preliminary

Injunction. Plaintiff stipulates to this request. The Parties thus request an extension of 15 days, or to **Tuesday, August 26, 2025**, for Dr. Williams to file his response or for the Parties to file the Stipulation and [Proposed] Consent Order.

DATED this 8<sup>th</sup> day of August, 2025.

DATED this 8<sup>th</sup> day of August, 2025.

J. CANTOR LAW  
CLARK HILL PLLC

AARON D. FORD  
Attorney General

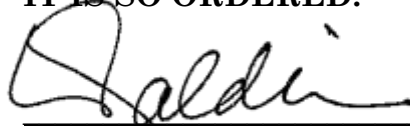
By: /s/ Julie D. Cantor

Julie D. Cantor MD, JD  
Paola M. Armeni, Esq.  
*Attorneys for Plaintiff*

By: /s/ Douglas R. Rands

DOUGLAS R. RANDS, Bar No. 3572  
Senior Deputy Attorney  
*Attorneys for Defendants*

**IT IS SO ORDERED.**



**UNITED STATES MAGISTRATE JUDGE**

**DATED:** August 11, 2025